

REMARKS

This application has been carefully reviewed in light of the Office Action dated June 7, 2004 (Paper No. 11). Claims 1 to 6 and 8 to 20 are pending in the application, of which Claim 1 remains the sole independent claim. Reconsideration and further examination are respectfully requested.

Formal drawings were filed in this application on February 14, 2002, but the USPTO has not yet indicated that these drawings have been approved. It is noted, for example, that the application was published with the originally-filed informal drawings, and not with the formal drawings filed on February 14, 2002. It is respectfully requested for the Patent Office to acknowledge and to approve the formal drawings.

Claims 1 to 6 and 8 to 20 were rejected under 35 U.S.C. § 101. In response, the claims herein have been amended in keeping with language suggested at MPEP § 2106 (see, for example, page 2100-12). Withdrawal of the rejection is respectfully requested.

Claims 1 to 6 and 8 to 20 were rejected under 35 U.S.C. § 102(e) over U.S. Patent Application Publication 2002/00593337 (Takaoka). The rejection is respectfully traversed.

The invention is directed to an XML-based document which includes text for plural pages as well as page-information text. According to a first aspect of the invention, the page-information text is delimited by page-information element types, each defining a byte location in the XML-based document of the text for respective ones of the plural pages. According to a second aspect of the invention, the XML-based document

further includes document-resource text that specifies a location pointer in the XML-based document for resources used by pages therein.

The applied Takaoka publication is not seen to disclose or to suggest at least the foregoing features of Claim 1, particularly as regards page-information element types that define a byte location in the XML-based document of text for respective ones of plural pages, and document-resource text that specifies a location pointer in the XML-based document for resources used by pages therein.

In more detail, it is Applicants' position that Takaoka does not describe page-information element types that define a byte-location "in the XML-based document" of text for respective ones of plural pages. It is clear from the rejection that the Office Action has equated Takaoka's <PageIndex> section, shown in Figure 2B thereof, with the claimed page-information element. However, Takaoka's <PageIndex> section does not indicate location "in the XML-based document" of text for respective ones of plural pages. Rather, as described at paragraphs [0056] to [0059] of Takaoka, the <PageIndex> section stores a remote location, and not a location of text "in the XML-based document":

"... Here, page= indicates a page of the generated electronic document, idref= indicates the id of an electronic source document, and efilepage= indicates a use page number of the electronic source document corresponding to id. In the above description example, pages separately designated from two electronic source documents are used."

Thus, Applicants maintain their position that Takaoka's <PageIndex> section does not indicate a location "in the document" of text for respective ones of plural pages. To emphasize this distinction, Claim 1 has been amended to specify a "byte-location in the XML-based document".

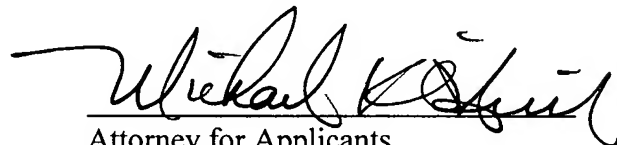
The Office Action further took the position that Takaoka's paragraphs [0056] through [0058] and Figure 2B thereof described document-resource text that specifies a location pointer in the XML-based document for resources used by pages therein. Again, Applicants' position is that Takaoka does not describe a location pointer "in the XML-based document", but rather describes a location pointer that points to resources outside the XML-based document.

It is therefore respectfully submitted that the claims herein define subject matter that differs non-obviously from Takaoka, and withdrawal of the rejection over Takaoka is respectfully requested.

No other matters being raised, it is believed that the entire application is fully in condition for allowance, and such action is courteously solicited.

Applicants' undersigned attorney may be reached in our Costa Mesa, California office at (714) 540-8700. All correspondence should continue to be directed to our below-listed address.

Respectfully submitted,



Attorney for Applicants
Michael K. O'Neill
Registration No. 32,622

FITZPATRICK, CELLA, HARPER & SCINTO
30 Rockefeller Plaza
New York, New York 10112-2200
Facsimile: (212) 218-2200

CA_MAIN 87279v1